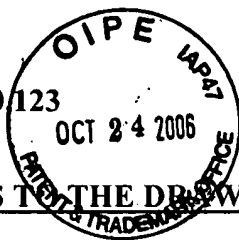


Application No.: 10/500/123



AMENDMENTS TO THE DRAWINGS:

Figs. 1-4 and 6-7 have been amended to indicate the location of the rear face and the light emission face of the light guiding plate and to show the correct location of the facet D2. Furthermore, Figs. 6-7 have been amended to include the legend "Prior Art" to indicate their status as prior art.

REMARKS

I. Introduction

In response to the pending Office Action, Applicant has amended claims 1, 3 and 7 to further clarify the subject matter of the present invention, and to overcome the objections. Claim 2 has been cancelled, without prejudice. In addition, Applicant has amended the specification to include the reference numeral for the adhesive represented by reference numeral 6 in Figs. 1-4 and 6-7. Applicant has also amended Figs. 1-4 and 6-7 to indicate the correct location of the rear and light emitting faces and the facet D2; and to indicate that Figs. 6 and 7 represent prior art. No new matter has been added.

For the reasons set forth above, Applicant respectfully submits that all pending claims are patentable over the cited prior art.

II. The Rejection Of Claims 1-8 Under U.S.C. § 103

Claims 1-8 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicant's Admitted Prior Art ("AAPA") in view of Ha et al. (US 2002/0186333). Applicant respectfully traverses the rejections of the above cited pending claims for at least the following reasons.

With regard to the present invention, amended claim 1 recites a lighting unit comprising: a lighting element provided with, a light guiding plate having a light emission face, facets and a rear face, a light source provided at one of the facets and a reflector covering the rear face and the facets of the light guiding plate and the light source, wherein light emitted from the light source is guided into the light guiding plate and is emitted from the light emission face outside the lighting element; a housing covering an edge portion of the light emission face, the facets and

the rear face of the light guiding plate, wherein heat discharge holes discharging heat generated in the lighting unit to the outside of the lighting unit are formed in a region of the housing located so as to correspond to the rear face of the light guiding plate; and a shield portion being provided between at least the rear face of the lighting guiding plate and the housing so as to cover the heat discharge holes.

It was alleged that the combination of AAPA and Ha rendered claim 1 of the present invention obvious. Specifically, while the Examiner admits that the AAPA fails to disclose a box shaped shield portion, he alleges that Ha teaches a box shaped shielding portion 700. However, as is clearly shown in Fig. 21 of Ha, the alleged shield portion 700 has a plurality of openings 710, 712 and windows 720, 722 and 724, through which dust and other contaminants may enter the lighting unit. A shield portion with this type of configuration does not provide for the prevention of dust from entering through the heat discharge holes. Thus, Ha does not disclose the limitation of claim 1 wherein a shield portion is provided between at least the rear face of the lighting guiding plate and the housing *so as to cover the heat discharge holes.*

More specifically, Ha does not teach or suggest that the alleged shield portion 700 covers heat discharge holes. Paragraph [0086] of Ha recites “a shield case 700 is disposed between the receiving container and the rear case 220 *to shield an electromagnetic wave discharged from the inverter board 500 and the A/D board 400*”. There is no mention in Ha of the need to prevent dust from entering through the heat discharge holes, or of the problems solved by the present invention. Accordingly, in view of the above arguments, Applicant submits that the proposed combination of the AAPA and Ha does not teach or suggest claim 1 of the present invention, nor is there any motivation to make the proposed combination.

As is well known, in order to establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 180 USPQ 580 (CCPA1974). As the AAPA and Ha both fail to teach or suggest a lighting unit comprising a shield portion being provided between at least the rear face of the lighting guiding plate and the housing so as to cover the heat discharge holes, then based on the foregoing, it is submitted that the AAPA and Ha do not render claim 1, or any claim dependent thereon obvious.

III. All Dependent Claims Are Allowable Because The Independent Claim From Which They Depend Is Allowable

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as claim 1 is patentable for the reasons set forth above, it is respectfully submitted that all pending dependent claims are also in condition for allowance.

IV. Conclusion

Having fully responded to all matters raised in the Office Action, Applicant submits that all claims are in condition for allowance, an indication for which is respectfully solicited.

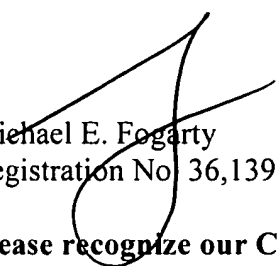
To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper,

Application No.: 10/500,123

including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP



Michael E. Fogarty
Registration No 36,139

600 13th Street, N.W.
Washington, DC 20005-3096
Phone: 202.756.8000 MEF/NDM:kap
Facsimile: 202.756.8087
Date: October 24, 2006

**Please recognize our Customer No. 20277
as our correspondence address.**